

Application No.: 09/980,483**Docket No.: 324-140****REMARKS**

The Office Action of September 27, 2005 has been considered in detail, and Applicants' hereby submit their comments to the Office Action below.

Applicants note the indication of claims 18-32 containing allowable subject matter subject to overcoming the rejection of claims 17-32 based on 35 U.S.C. §112, paragraph 2. Appropriate amendments to the claims have been made to overcome the rejections based on 35 U.S.C. §112, paragraph 2.

In addition, the claims have been amended to prevent interpretation thereof under 35 U.S.C. §112, paragraph 6, to assure infringement at the time the goods are sold, i.e., prior to being put into use, and to assure open-ended coverage. Method claims 33 and 34 are added. Claim 33 is of a scope similar to that of claim 17, while claim 34 is somewhat broader because it does not include some apparatus limitations of claims 17 and 33. The title has been amended to indicate the invention is concerned with a method.

Rejection Under 35 U.S.C. §103

Applicants traverse the rejection of claim 17 under 35 U.S.C. §103(a) as being obvious over Kakuma et al. (U.S. Patent 5,504,742, in view of Sone et al. (U.S. Patent 5,577,032).

Claim 17, is directed to a terminal installation comprising terminals. The terminal installation is adapted to be connected to a telecommunication line for conveying network cells in ATM mode. The installation is required to broadcast all the network cells received via a receive channel of the telecommunication line to the terminals, and collect cells produced by the terminals and transmit them in an emit channel of the telecommunication line. Claims 33 and 34 are concerned with method of performing the foregoing operations.

The words "broadcasting arrangement " in claim 17 are to be interpreted in accordance with page 2, lines 25 to 29 of the present application so that the term "broadcast," in contrast to the term "switch" or "demultiplex," indicates that all correct cells coming from the telecommunication line reach a terminal independently of any destination address contained in each cell. Hence, the cells are "broadcast" to all terminals, and each terminal selects, from the plurality of received cells, which cells are at the correct destination. In reference to page 13, lines

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3-8, the broadcast arrangement is a replicator which copies each received network cell into each local loop in the downlink direction.

Kakuma et al. describe a broadband ISDN remote multiplexer 40 that is constructed by separating a subscriber line interfacing section from an ATM exchange. Multiplexer 14 is installed at a remote location connected via a high-speed transmission line. For the transmission direction illustrated in Figure 2 of Kakuma et al., broadband ISDN multiplexer 40 is connected to subscriber terminals 21-22 via subscriber lines 24, and to ATM switch 38. Subscriber line interfacing circuits (SINF) 25 in the subscriber lines 24 convert the ATM cells into cells (Figure 3A) having a header with 6 bytes. When the 6 bytes are compared to a standardized ATM cell (Figure 3B), the six bytes are modified to include an additional first byte and a byte replacing an error checking HEC byte. After being multiplexed in multiplexing circuit 27, transmission interfacing circuit (TINF) 32 converts the header of the cell into the UNI format (shown in Figure 3C) by replacing the GFC field by a 4-bit number A that designates the destination; see column 5, lines 31-50 of Kakuma et al. Following the receiving direction, a cell having the format of Figure 3A is converted to the format of Figure 3C, and then to the format of Figure 3A so demultiplexer 29 can route the cell to subscriber line interfacing circuit 25 designated by the lower-order four bits of the TAG label; see column 6, lines 43-46. Upon receiving the signal, multiplexer-demultiplexer block 40 functions as a switching-over device to switch over each cell, designated by the TAG label, through the demultiplexer 29 and towards subscriber terminal 21 or 22.

As shown above, there is a significant difference between the demultiplexer 29 in the multiplexer-demultiplexer block 40 of Kakuma et al., in which a cell is simply directed to a destination terminal in accordance with a designated destination. Claim 17 requires all the network cells received via a receive channel of the telecommunication line to be broadcast to all the cells received via a receive channel of the telecommunication line to the terminals. It would not have been obvious to modify the system of Kakuma et al. to arrive at the system of claim 17, because such a modification is contrary to the basic principles and objects of the Kakuma reference. In addition, such a modification would appear to require significant changes to the Kakuma et al. reference that are not made obvious by Sone et al.

Sone et al., U.S. Patent No. 5,577,032, discloses a broadcast service system comprising two ATM switching nodes 20-1 and 20-2 respectively connected to broadcast transmission

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terminals 1-j (TV cameras) and broadcast reception terminals 4-i (TV receivers). In each switching node 20-1, 20-2, an ATM input cell in an input path is broadcast only to some (but not all) output paths which are designated by identification (ID) information corresponding to a virtual call identifier (VCI) included in the input cell. This correspondence is stored in tables 33 and 34 in the module distribution 30-1, 30-2 connected to the switching node (FIGS. 2 and 3; column 6, lines 21-33).

In particular, broadcast reception terminal 4-i receives only cells from ONE broadcast transmission terminal 1-j which transmits cells in an input path selected in a correspondence with the output path to reception terminal 4-i. The correspondence is stored in tables 33 and 34 of the module distribution 30-2 connected to the switching node 20-2 (column 5, line 65 to column 6, line 13). Broadcast reception terminal 4-I does not receive all the ATM cells that the other broadcast reception terminals 4-1 to 4-N receive, i.e. switching node 20-2 transmit cells selectively to reception terminals 4-1 to 4-N via respective output paths.

It would not have been obvious for one of ordinary skill in the art to modify the demultiplexer (and not the multiplexer) of Kamura as it provides selective distributing (and not broadcasting) of the switching node 20-2 connected to the reception terminals 4-1 to 4-N as disclosed by Sone to provide the broadcast arrangement recited in claim 17, because the Kakuma et al. demultiplexer and switching node 20-2 both act as demultiplexers.

In view of the foregoing amendments and remarks, favorable reconsideration and allowance are in order.

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To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,

LOWE HAUPTMAN & BERNER, LLP



Allan M. Lowe
Registration No. 19,641

Customer Number: 22429
1700 Diagonal Road, Suite 300
Alexandria, Virginia 22314
(703) 684-1111
(703) 518-5499 Facsimile

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